

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

PENNY NINTIVAGGI et al., individually and  
on behalf of all others similarly situated,

Civil Action No. 20-cv-1478-SB

*Plaintiffs,*

v.

UNIVERSITY OF DELAWARE,

*Defendant.*

PUBLIC VERSION  
FILED 9/2/2022

HANNAH RUSSO, individually and on be-  
half of all others similarly situated,

Civil Action No. 20-cv-1693-SB

*Plaintiff,*

v.

UNIVERSITY OF DELAWARE,

*Defendant.*

**DECLARATION OF JAMES D. TAYLOR, Jr.**

Pursuant to 10 Del. C. § 3927, James D. Taylor, Jr. hereby declares:

1. I am an attorney admitted to practice law before this Court. I am a partner at the law firm of Saul Ewing Arnstein & Lehr LLP, counsel for Defendant University of Delawre. I submit this declaration in support of Defendant's Opposition to Plaintiffs' Motion for Class Certification.
2. To the best of my knowledge, information and belief, true and correct copies of the following documents are attached hereto as follows:

<b>Ex. No.</b>	<b>Description</b>
3	Portions of Undergraduate Catalog bates stamped UD 188080 to UD 188092
4	Portions of Graduate Catalog bates stamped UD 0189921 to UD 0189930
5	[REDACTED]

6	March 13, 2020 letter from Governor Carney bates stamped UD_0239835-UD_0239836
7	Governor Carney's Second Modification to the Declaration of State of Emergency bates stamped UD_0239806 to UD_0239810
8	Governor Carney's Fourth Modification of the Declaration of a State of Emergency bates stamped UD_0239750 to UD_0239767 and UD_0239689-UD_0239694
9	Governor Carney's Fifth Modification of the Declaration of a State of Emergency bates stamped UD_0239732 to UD_0239738
10	University of Delaware Academic Calendar 2019-2020 bates stamped UD_189403 to UD_189404
11	University of Delaware revised Academic Calendar 2019-2020 bates stamped UD_0189593
12	[REDACTED]
13	[REDACTED]
14	[REDACTED]
15	[REDACTED]
17	[REDACTED]
18	[REDACTED]
19	[REDACTED]
20	[REDACTED]
21	[REDACTED]
29	[REDACTED]
30	[REDACTED]
31	[REDACTED]
34	[REDACTED]
35	Defendant's First Set of Requests for Admissions
36	Defendant's Second Set of Requests for Admissions
37	Plaintiffs' Responses to Defendant's First Set of Requests for Admissions
38	Plaintiffs' Responses to Defendant's Second Set of Requests for Admissions
40	Facts and Figures from University of Delaware Web Site
42	Declaration of Colin B. Weir
44	[REDACTED]
45	[REDACTED]
46	[REDACTED]
47	[REDACTED]
48	[REDACTED]
49	[REDACTED]
50	[REDACTED]

SAUL EWING ARNSTEIN & LEHR LLP

/s/James D. Taylor, Jr.  
James D. Taylor, Jr. (#4009)  
Marisa R. De Feo (#6778)  
Juliana G. Clifton (#6980)  
1201 N. Market Street, Suite 2300  
Wilmington, DE 19801  
(302) 421-6800  
[James.taylor@saul.com](mailto:James.taylor@saul.com)  
[Marisa.defeo@saul.com](mailto:Marisa.defeo@saul.com)

OF COUNSEL

*Counsel for Defendant University of Delaware*

Jonathan A. Singer (*admitted pro hac vice*)  
SAUL EWING ARNSTEIN & LEHR LLP  
1001 Fleet Street, 9th Floor  
Baltimore, MD 21202  
(410) 332-8690

Dated: August 26, 2022